



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Road
Twinsburg, OH 44087-1924

TELE: (330) 963-1200 FAX: (330) 487-0769
www.epa.state.oh.us

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Laura H. Powell, Acting Director

January 24, 2007

RE: QUAKER MANUFACTURING CORP.
COLUMBIANA COUNTY
NON-NOTIFIER
NOTICE OF VIOLATION (NOV)/RTC
COMPLAINT NUMBER 6895

OH R 000 139 100

William D. Blanton
Plant Manager
Quaker Manufacturing Corp.
187 Georgetown Road
Salem, OH 44460

Dear Mr. Blanton:

On January 9, 2007, I, as a representative of the Ohio EPA Division of Hazardous Waste Management, conducted an inspection of Quaker Manufacturing Corp. (Quaker Manufacturing), located at 187 Georgetown Road, Salem, Ohio, for compliance with Ohio's hazardous waste and used oil regulations. You, Teresa Reckner (Human Resources Director) and Ed Nunzer (Maintenance Manager) represented Quaker Manufacturing during the inspection. Robert Klusty (Director of Quality Assurance) subsequently provided additional information.

This inspection was in response to a complaint received by Ohio EPA alleging that Quaker Manufacturing was not properly managing used oil that leaked from the presses in the southwest press room and used solvents.

The facility conducts two major manufacturing activities:

- Metal stamping using progressive dies for forming metal products;
- Tool & die construction to manufacture and machine precision tools & dies for metal stamping.

No painting is conducted at the facility. If coating or plating is needed, this is done at a sub-contractor's facility. Metal is not degreased prior to stamping.

The only potential hazardous waste identified during the inspection is spent alkaline detergent (SF-77) used to degrease parts for maintenance, but after use it is probably usually less than the 12.5 pH required to be a corrosive hazardous waste. After use it is poured into a used oil container. The facility reports that it purchases 1-2 gallons of SF-77 per month.

The facility generates used oil from several sources including: used cutting oils, equipment leakage and occasional vehicle oil change. The used oil is recycled.

The facility generates used fluorescent bulbs. They are recycled.

The inspection included a review of the facility's operations, as well as the waste management practices and documentation. Quaker Manufacturing was inspected for the requirements of a conditionally exempt small quantity generator (CESQG) of hazardous waste.

This letter will explain the violations I found and steps you need to take to correct them.

I found the following violations of Ohio's used oil and universal waste laws:

- 1. OAC 3745-273-14(E) Small quantity handler must label unit holding universal waste lamps**

Used fluorescent bulbs were observed in 4 boxes on which were printed the words "Used Fluorescent Bulbs". The box was not properly labeled.

The facility abated the violation during the inspection by labeling the containers with the words: "Universal Waste- Lamps".

2. OAC 3745-279-22 (C)(1) Used oil containers must be labeled with the words "Used Oil".

Two containers used for used oil storage were not labeled with the words "Used Oil".

The facility abated the violation during the inspection by labeling the containers with the words: "Used Oil".

Several concerns that arose from this inspection are listed below.

1. Manhole used for used oil storage not labeled.

Used oil that drips from the five metal stamping presses in southwest section of the plant falls into a basement. Used oil and any other liquids in the basement (e.g., water that leaks into the basement on occasion) enter floor drains that in turn drain to a blinded-off sewer manhole.

This sewer manhole apparently meets the definition of an underground storage tank and stores used oil.

There was some uncertainty during the inspection on how the two manholes at the facility operate. The facility is encouraged to mark or label the appropriate manhole cover with the words "Used Oil" to clearly identify which manhole contains used oil.

If this underground storage tank had been built with a conventional inlet pipe, rule OAC 3745-279-22 (C)(2) would require that the inlet pipe be labeled or marked clearly with the words "Used Oil."

2. Bureau of Underground Storage Tanks (BUSTR) Rules.

Per rule OAC 3745-279-22, underground tanks used for storage of used oil by used oil generators are potentially subject to BUSTR's underground storage tank rules. I have notified BUSTR of my observations regarding the manhole used for used oil storage. Presumably BUSTR will contact the facility.

3. Backup of used oil into the basement.

The facility is cautioned to not allow used oil in the manhole to backup into the basement underneath the presses, as this could potentially result in using the basement as a used oil underground storage tank and potentially subject it to BUSTR standards.

Enclosed you will find a copy of the checklists completed during the inspection.

You can find copies of Ohio's hazardous waste laws and regulations at our web page at:
http://www.epa.state.oh.us/dhwm/laws_regs.html.

Ohio EPA DHWM factsheets can be found at the following internet site:
<http://www.epa.state.oh.us/dhwm/guidancedocuments.html>.

QUAKER MANUFACTURING CORP.
JANUARY 24, 2007
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The Division of Hazardous Waste Management has created an electronic news service to provide you with quick and timely updates on events and news related to hazardous waste activities in Ohio. If you haven't already, we encourage you to sign-up for this free service. You can find more information at the following Web link <http://www.epa.state.oh.us/dhwm/listserv.html>. Please feel free to share this information with your colleagues.

We appreciated the opportunity to discuss the facility's pollution prevention program. Ohio EPA strongly encourages pollution prevention as the preferred approach for waste management. The first priority of pollution prevention is to eliminate the generation of wastes and pollutants at the source (source reduction). For those wastes and pollutants that are generated, the second priority is to recycle or reuse them in an environmentally sound manner. Your company can benefit economically, help preserve the environment and improve its public image through pollution prevention.

For more information about pollution prevention, including fact sheets or U.S. EPA's "Facility Pollution Prevention Guide" (EPA/600.R-92/088), please contact the Ohio EPA Office of Compliance Assistance and Pollution Prevention (OCAPP) at 1-800-329-7518, or this writer, or visit OCAPP's website at <http://www.epa.state.oh.us/ocapp/ocapp.html>.

Should you have any questions regarding this letter, please contact me at (330) 963-1165.

Sincerely,



Neil J. Wasilk
Environmental Specialist
Division of Hazardous Waste Management

NJW:ddw

Enclosure

cc: Natalie Oryshkewych; Ohio EPA, DHWM, NEDO
ec: Ed D'Amato, Ohio EPA, DHWM, NEDO

NOTICE:

Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your facility from its obligation to comply with all applicable regulations.

E-mail this completed form to tammy.mcconnell@pa.state.oh.us or mail it to Tammy McConnell, Central Office	Ohio Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM		For Ohio EPA use only																			
2. Site EPA ID No.	EPA ID Number: Non-notifier																					
3. Site Name	Name: Quaker Manufacturing Corp.		Website (optional:)																			
4. Site Location Information	Street Address: 187 Georgetown Road																					
	City, Town, or Village: Salem		State: OH																			
	County Name: Columbiana		Zip Code: 44460																			
5. Site Land Type (check only one)	<table border="1" style="width: 100%; text-align: center;"> <tr> <td>Private</td> <td>County</td> <td>District</td> <td>Federal</td> <td>Indian</td> <td>Municipal</td> <td>State</td> <td>Other</td> </tr> <tr> <td>X</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </table>				Private	County	District	Federal	Indian	Municipal	State	Other	X									
Private	County	District	Federal	Indian	Municipal	State	Other															
X																						
6. NAICS code(s) www.census.gov/epcd/www/naics.html	A. 3469		B.																			
	C.		D.																			
7. Facility Representative: Additional names can be recorded in number 12. Only provide address information if it is different than the site address.	First Name: Teresa		MI:	Last Name: Reckner																		
	Phone Number: 330-332-4631			Phone Number Extension:																		
	E-Mail Address: treckner@quakermfg.com																					
	Fax Number:			Fax Number Extension:																		
	Street or P.O. Box:																					
	City, Town or Village:																					
	State:		Country:		Zip Code:																	
8. Legal Owner and Operator of the Site List Additional Owners and/or Operators in the Comment Section or on another copy of this form page.	A. Name of Site's Legal Owner:		Date Became Owner (mm/dd/yyyy):																			
	Quaker Manufacturing Corp.																					
	Owner Type: Mark with an X	<table border="1" style="width: 100%; text-align: center;"> <tr> <td>Private</td> <td>County</td> <td>District</td> <td>Federal</td> <td>Indian</td> <td>Municipal</td> <td>State</td> <td>Other</td> </tr> <tr> <td>X</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </table>					Private	County	District	Federal	Indian	Municipal	State	Other	X							
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	X																					
	Street or P.O. Box:																					
	City, Town, or Village:			Owner Phone #:																		
	State:		Country:		Zip Code:																	
	B. Name of Site's Operator:		Date Became Operator (mm/dd/yyyy):																			
	Quaker Manufacturing Corp.																					
Operator Type: Mark with an X	<table border="1" style="width: 100%; text-align: center;"> <tr> <td>Private</td> <td>County</td> <td>District</td> <td>Federal</td> <td>Indian</td> <td>Municipal</td> <td>State</td> <td>Other</td> </tr> <tr> <td>X</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </table>					Private	County	District	Federal	Indian	Municipal	State	Other	X								
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X																						
Street or P.O. Box:																						
City, Town, or Village:			Operator Phone #:																			
State:		Country:		Zip Code:																		
9. Violations Cited? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No																						
10. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes.) <input type="checkbox"/> Not Regulated																						

10. Type of Regulated Waste Activity (Mark "X" of the appropriate boxes.)

A. Hazardous Waste Activities																	
(choose only one of the following categories)																	
<input type="checkbox"/>	UNKNOWN: Cited for violation of 3745-52-11	<input type="checkbox"/> 3. Treater, Storer or Disposer of Hazardous Waste															
<input type="checkbox"/>	a. Large Quantity Generator (LQG):	<input type="checkbox"/> 4. Recycler of Hazardous Waste															
<input type="checkbox"/>	b. Small Quantity Generator (SQG)	<input type="checkbox"/> 5. Exempt Boiler and/or Industrial Furnace															
<input checked="" type="checkbox"/>	c. Conditionally Exempt Small Quantity Generator	<input type="checkbox"/> a. Small Quantity On-site Burner Exemption															
<input type="checkbox"/>	d. United States Importer of Hazardous Waste	<input type="checkbox"/> b. Smelting, Melting, Refining Furnace Exemption															
<input type="checkbox"/>	e. Mixed Waste (hazardous and radioactive) Generator	<input type="checkbox"/> 6. Underground Injection Control Facility															
B. Universal Waste Activities		C. Used Oil Activities															
<input checked="" type="checkbox"/>	1. Small Quantity Handler of Universal Waste (Indicate types of universal waste generated and/or accumulated (check all boxes that apply):	<input checked="" type="checkbox"/> 1. Used Oil Generator															
<input type="checkbox"/>	2. Large Quantity Handler of Universal Waste (accumulates 5,000 kg or more).	<input type="checkbox"/> 2. Used Oil Transporter Indicate Type(s) of Activity(ies) <input type="checkbox"/> Transporter <input type="checkbox"/> Transfer Facility															
<input type="checkbox"/>	3. Destination Facility for Universal Waste (Check all boxes below that apply for each of the three types of facilities above.)	<input type="checkbox"/> 3. Used Oil Processor and/or Re-refiner Indicate Type(s) of Activity(ies) <input type="checkbox"/> Processor <input type="checkbox"/> Re-refiner															
	<table border="0" style="width:100%;"> <tr> <td></td> <td style="text-align:center"><u>Generated</u></td> <td style="text-align:center"><u>Accumulated</u></td> </tr> <tr> <td>A. Batteries</td> <td style="text-align:center"><input type="checkbox"/></td> <td style="text-align:center"><input type="checkbox"/></td> </tr> <tr> <td>B. Pesticides</td> <td style="text-align:center"><input type="checkbox"/></td> <td style="text-align:center"><input type="checkbox"/></td> </tr> <tr> <td>C. Thermostats</td> <td style="text-align:center"><input type="checkbox"/></td> <td style="text-align:center"><input type="checkbox"/></td> </tr> <tr> <td>D. Lamps</td> <td style="text-align:center"><input checked="" type="checkbox"/></td> <td style="text-align:center"><input type="checkbox"/></td> </tr> </table>		<u>Generated</u>	<u>Accumulated</u>	A. Batteries	<input type="checkbox"/>	<input type="checkbox"/>	B. Pesticides	<input type="checkbox"/>	<input type="checkbox"/>	C. Thermostats	<input type="checkbox"/>	<input type="checkbox"/>	D. Lamps	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> 4. Off-Specification Used Oil Burner
	<u>Generated</u>	<u>Accumulated</u>															
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B. Pesticides	<input type="checkbox"/>	<input type="checkbox"/>															
C. Thermostats	<input type="checkbox"/>	<input type="checkbox"/>															
D. Lamps	<input checked="" type="checkbox"/>	<input type="checkbox"/>															
		<input type="checkbox"/> 5. Used Oil Fuel Marketer - Indicate Type(s) of Activity(ies) <input type="checkbox"/> a. Marketer Who Directs Shipment of Off- Specification Oil <input type="checkbox"/> b. Used Oil to Off-Specification Used Oil Burner															
<p>11. Waste Codes for Federally Regulated Hazardous Wastes. Please list the codes for the federally regulated hazardous waste handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more space is needed. If there are more than 7 waste codes and they are the same as listed in the most recent RCRAInfo source record, you do not need to list them all. Instead just indicate the date of the most recent source record.</p> <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:15%;">D002</td> <td style="width:15%;"></td> <td style="width:15%;"></td> <td style="width:15%;"></td> <td style="width:15%;"></td> <td style="width:15%;"></td> <td style="width:15%;"></td> </tr> </table>			D002														
D002																	
<p>12. Comments: Use this area to describe whether the inspection was announced, whether the waste is stored in tanks or containers, etc.</p> <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:5%; text-align:center">No</td> <td style="width:15%;">Announced ?</td> <td style="width:30%;">Additional Facility Representatives:</td> <td>William Blanton, Teresa Reckner, Ed Nunzer</td> </tr> <tr> <td style="text-align:center">No</td> <td>Tanks?</td> <td colspan="2" rowspan="2">Other comments:</td> </tr> <tr> <td style="text-align:center">Y</td> <td>Containers?</td> </tr> </table>			No	Announced ?	Additional Facility Representatives:	William Blanton, Teresa Reckner, Ed Nunzer	No	Tanks?	Other comments:		Y	Containers?					
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<p>13. Name of Inspector(s) _____ Name of Inspector(s) _____ Date of Inspection/ Time (mm-dd-yyyy) (HH:MM)</p> <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:35%;">Neil Wasilk, OEPA</td> <td style="width:35%;"></td> <td style="width:30%;">1-9-07; 10:30 a.m.-1:45 p.m.</td> </tr> </table>			Neil Wasilk, OEPA		1-9-07; 10:30 a.m.-1:45 p.m.												
Neil Wasilk, OEPA		1-9-07; 10:30 a.m.-1:45 p.m.															
<p>14. OPTIONAL CERTIFICATION. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.</p> <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:35%;">Signature of owner, operator, or an authorized representative</td> <td style="width:35%;">Name and Title (Print)</td> <td style="width:30%;">Date (mm-dd-yyyy)</td> </tr> <tr> <td> </td> <td> </td> <td> </td> </tr> </table>			Signature of owner, operator, or an authorized representative	Name and Title (Print)	Date (mm-dd-yyyy)												
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QUIKER MANUFACTURING
CONDITIONAL, EXEMPT SMALL QUANTITY GENERATOR REQUIREMENTS
COMPLETE AND ATTACH A PROCESS, WASTE, P2 SUMMARY SHEET

CESQG: <100Kg. (Approximately 25-30 gallons) of waste in a calendar month.
SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.
LQG: >1,000 Kg. (~300 gallons) of waste in a calendar month or >1 Kg. of acutely hazardous waste in a calendar month.
NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.

Safety Equipment Used:

WASTE EVALUATION

1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] Yes No N/A

GENERATOR CLASSIFICATION

2. Does the generator produce <100 kg. of hazardous waste per month? [conditionally exempt small quantity generator ("CESQG")] Yes No N/A

NOTE: If quantities of hazardous waste accumulated on-site at any one time exceed 1,000 Kg. - or the generator produces between 100 and 1,000 Kg. of hazardous waste per month, it is operating as a Small Quantity Generator ("SQG"). If so, complete the Small Quantity Generator Requirements checklist.

OFF-SITE SHIPMENT OF HAZARDOUS WASTE

3. Does the CESQG ensure delivery of hazardous waste(s) to an off-site permitted TSD? Yes No N/A
[3734.02(F)] SPENT DETERGENTS USED FOR DEGREASING ARE MIXED WITH USED OIL.

TREATMENT OF HAZARDOUS WASTE - NOT TREATING HAZ WASTE.

4. Does the generator treat hazardous waste in a :
- a. Container that meets 3745-66-70 to 3745-66-77? Yes No N/A
 - b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97(C) Yes No N/A
 - c. Drip pads that meet 3745-69-40 to 3745-69-45? Yes No N/A
 - d. Containment building that meets 3745-256-100 to 3745-256-102? Yes No N/A

NOTE: If the CESQG conducts treatment they are subject to the LQG requirements.
NOTE: If waste is treated to meet LDRs, use LDR checklist.

REMARKS

ONLY POTENTIAL HAZARDOUS WASTES IDENTIFIED WERE ALKALINE DETERGENTS USED FOR DEGREASING. AS PURCHASED MSDS STATES PH = 13.5. AFTER ^{IT'S} USED, PH IS EXPECTED TO BE < 12.5. ESTIMATED ANNUAL USAGE IS 1-2 GALLONS PER MONTH OF AS PURCHASED DETERGENT.

Quaker Manufacturing Corp.
187 Georgetown Road
Salem, OH 44460

PROCESS DESCRIPTION SECTION

Give a general process description (include all processes at the facility)

Facility has two major manufacturing activities:

- Metal stamping using progressive dies for forming products;
- Tool & Die construction to manufacture and machine precision tool & dies for metal stamping.

No painting is conducted at the facility. If coating or plating is needed, this is done at a sub-contractor's facility.

Metal is not degreased prior to stamping. Reportedly no chlorinated solvents used at the facility.

WASTE ACTIVITIES AND P2 SUMMARY SECTION

For each of the processes listed above that generate a waste give the following information: (1) name of process generating waste, (2) name or description of waste generated (e.g. sludge, solvent, ash, used oil, spent lamps, etc.), (3) EPA waste codes, if applicable, (4) quantity generated per month, (5) type of accumulation (container, tank, etc.) (6) waste accumulation location in facility, (7) type of on-site treatment (if used), (8) name of off-site management facility and type of waste management activity occurring there, (9) Current P2 activities, and (10) P2 opportunities.

SF-77, which is an alkaline detergent (ph =13.5 per MSDS) is reportedly used as a solvent when degreasing is needed during equipment maintenance. Typically used in 5 gallon buckets. Usually used one time and then poured into the used oil containers. May be diluted prior to use. Purchase 1-2 gallons of SF-77 per month.

Facility has a part washer, but reported that it is seldom used and that it still had the initial charge of solvent. GG-77 is used as the solvent. GG-77 has a F.P. of >150 F per MSDS and a pH of 13.5 per the MSDS.

Used oil is generated from several sources including: used cutting oils, equipment leakage and occasional vehicle oil change.

Used oil reported to be held in two 275 gallon "tanks". The tanks are actually containers per used oil rules. Used oil collector varies depending on price. Have used Safety Kleen, Everclear and Op-Tech.

Used fluorescent bulbs reported to be recycled through Safety Kleen.

Lead acid batteries reported to be recycled through suppliers of new batteries (e.g., batteries for tow motors).

REMARKS-GENERAL INFORMATION

Regulatory/Enforcement History (if applicable):

Additional P2 remarks and information:

Would this facility be interested in a P2 assessment? No

*If yes, refer promptly to your district P2 coordinator.

Office of Compliance Assistance and Pollution Prevention - 1-800-329-7518
or p2mail@epa.state.oh.us or www.epa.state.oh.us/ocapp/ocapp.html

Other:

USED OIL INSPECTION CHECKLIST (Short Version)

NOTE: This checklist does not include requirements for used oil transporters and transfer facilities, processors and re-refiners, burners, and marketers.

PROHIBITIONS

1. Is used oil being managed in a surface impoundment or waste pile? If so: Yes ___ No N/A ___ RMK# ___
Is the surface impoundment or waste pile being regulated under OAC 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-12(A)] Yes ___ No N/A RMK# ___
2. Is used oil being used as a dust suppressant? [3745-279-12(B)] Yes No N/A ___ RMK# ___
3. Is off-specification used oil fuel burned for energy recovery only in devices specified in 3745-279-12(C)? Yes ___ No N/A ___ RMK# ___

USED OIL GENERATOR STANDARDS

4. Does the generator mix hazardous waste with used oil only as provided in 3745-279-10(B)? [3745-279-21(A)] Yes No N/A ___ RMK#
5. Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)] Yes ___ No N/A RMK# ___
6. Does the generator only store used oil in tanks, containers, or units subject to OAC 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-22(A)] Yes No N/A ___ RMK# ___
7. Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)] Yes No N/A ___ RMK# ___
8. Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)] Yes ___ No N/A ___ RMK#
9. Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)] **NO RELEASES REPORTED**
- a. Stopped the release? Yes ___ No N/A RMK# ___
- b. Contained the release? Yes ___ No N/A RMK# ___

- c. Cleaned up and properly managed the used oil and other materials? Yes ___ No N/A RMK# ___
- d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes ___ No N/A RMK# ___
10. Does the generator burn used oil in used fired space heaters? [3745-279-23] If so: Yes ___ No N/A ___ RMK# ___
- a. Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators? Yes ___ No N/A RMK# ___
- b. Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour? Yes ___ No N/A RMK# ___
- c. Are the combustion gases from heater vented to the ambient air? Yes ___ No N/A RMK# ___
11. Does the generator have the used oil hauled only by transporters that have obtained U.S. EPA ID#, unless the generator qualifies for an exemption pursuant to 3745-279-24 (self transportation or tolling agreements)? [3745-279-24] Yes No N/A ___ RMK# ___

USED OIL COLLECTION CENTERS AND AGGREGATION POINTS

12. Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30] Yes ___ No N/A RMK# ___
13. Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31] Yes ___ No N/A RMK# ___
14. Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32] Yes ___ No N/A RMK# ___

WASTE EVALUATION

15. Have all wastes generated at the facility been evaluated? [3745-52-11] Yes No N/A ___ RMK# ___

C:\My Documents\OEPA Forms\USED OIL.SHORT.11.2004.wpd

REMARKS

MAN HOLE USED FOR USED OIL STORAGE IS A UST, AND ^{FILL PIPE} WAS NOT MARKED OR LABELED.

BUSR NOTIFIED OF UST.

SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS - BATTERIES AND LAMPS

Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more

Small Quantity Universal Waste Handler (SQUWH) = 5,000 Kg or less

PROHIBITIONS

1. Did the SQUWH dispose of universal waste? [3745-273-11(A)] Yes No ___ N/A ___ RMK# ___
2. Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in 3745-273-17 or managing specific wastes as provided in 3745-273-13? [3745-273-11(B)] Yes No N/A ___ RMK# ___

WASTE MANAGEMENT & LABELING/MARKING

**UNIVERSAL WASTE BATTERIES NO UNIVERSAL WASTE BATTERIES
ONLY BATTERIES ARE STANDARD ALKALINE DRY CELLS**

3. Are battery(ies) that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)] Yes ___ No N/A ___ RMK# ___
4. If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)] Yes ___ No N/A ___ RMK# ___
5. Does the SQUWH conduct any of the following activities:
- a. Sort batteries by type? Yes ___ No ___ N/A ___ RMK# ___
 - b. Mix battery types in one container? Yes ___ No ___ N/A ___ RMK# ___
 - c. Discharge batteries to remove the electric charge? Yes ___ No ___ N/A ___ RMK# ___
 - d. Regenerated used batteries? Yes ___ No ___ N/A ___ RMK# ___
 - e. Disassemble them into individual batteries or cells? Yes ___ No ___ N/A ___ RMK# ___
 - f. Remove batteries from consumer products? Yes ___ No ___ N/A ___ RMK# ___
 - g. Remove the electrolyte from the battery? Yes ___ No ___ N/A ___ RMK# ___
- If so, are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)(2)] Yes No ___ N/A RMK# ___

6. If the electrolyte is removed or other waste generated, has it been determined whether it is a hazardous waste? [3745-273-13(A)(3)]
- Yes ___ No N/A ___ RMK# ___
- a. If the electrolyte or other waste is characteristic, is it managed in compliance with 3745-50 through 3745-69? [3745-273-13(A)(3)(a)]
- Yes ___ No N/A ___ RMK# ___
- b. If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-13(A)(3)(b)]
- Yes ___ No N/A ___ RMK# ___
7. Are the battery(ies) of container(s) of batteries labeled with the words "Universal Waste - Batteries" or "Waste Battery(ies)" or "Used Battery(ies)?" [3745-273-14(A)]
- Yes ___ No N/A RMK# ___

UNIVERSAL WASTE LAMPS

8. Does the SQGUHW contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and are compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(D)(1)]
- Yes No N/A ___ RMK# ___
9. Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage spillage or damage that could cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)]
- Yes No N/A ___ RMK# ___
10. Are the lamps or containers or packages of lamps labeled with the words "Universal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)?" [3745-273-14(E)]
- Yes ___ No N/A ___ RMK# ___

NOTE: Treatment (such as crushing) by a UWH is prohibited under this rule unless the facility is permitted for such activities [3745-273-31(B)]. A generator crushing lamps must manage lamps according to hazardous waste rules (OAC Chapter 3745-52). Lamp crushing is a form of

generator treatment (OAC 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility under a hazardous waste manifest.

ACCUMULATION TIME

11. Is the waste accumulated for less than one year? [3745-273-15(A)] If not: Yes No ___ N/A ___ RMK# ___
- a. Was the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the handler to demonstrate) [3745-273-15(B)] Yes ___ No N/A RMK# ___

NOTE: Accumulation is defined as date generated or date received from another handler.

12. Is the length of time the universal waste is stored documented by one of the following: [3745-273-15(C)] Yes ___ No N/A ___ RMK# ___
- a. Marking or labeling the container with the earliest date when the universal waste became a waste or was received? [3745-273-15(C)(1)] Yes ___ No N/A ___ RMK# ___
- b. Marking or labeling individual item(s) of universal waste with the earliest date that it became a waste or was received? [3745-273-15(C)(2)] Yes ___ No N/A ___ RMK# ___
- c. Maintaining an inventory system on-site that identifies the date the universal waste became a waste or was received? [3745-273-15(C)(3)] Yes ___ No N/A ___ RMK# ___
- d. Maintaining an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste items or a group of containers became a universal waste or was received? [3745-273-15(C)(4)] Yes ___ No N/A ___ RMK# ___
- e. Placing the universal waste in a specific accumulation area and identifying the earliest start date or date received? [3745-273-15(C)(5)] Yes ___ No N/A ___ RMK# ___
- f. Any other method, which clearly demonstrates, the length of time the universal waste has been accumulated from the date it became a waste or was received? [3745-273-15(C)(6)] Yes No ___ N/A ___ RMK# ___
SHIPPING PAPERS

EMPLOYEE TRAINING

13. Are employees who handle or have the responsibility for managing universal waste informed of waste handling/emergency procedures, relative to their responsibilities? [3745-273-16] Yes No N/A RMK#

RESPONSE TO RELEASES

14. Are releases of universal waste and other residues immediately contained? [3745-273-17(A)] Yes No N/A RMK#
15. Is the material released characterized? [3745-273-17(B)] Yes No N/A RMK#
16. If the material released is a hazardous waste, is it managed as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to Chapter 3745-52) [3745-273-17 (B)] Yes No N/A RMK#

OFF-SITE SHIPMENTS

NOTE: If a SQUWH self-transport waste, then they must comply with the Universal Waste transporter requirements.

17. Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)] Yes No N/A RMK#

NOTE: SQUWHs are prohibited to send waste to any other facility.

18. If the universal waste meets the definition of hazardous material under 49 CFR 171-180, are DOT requirements met with regard to package, labels, placards and shipping papers? [3745-273-18(C)] Yes No N/A RMK#
19. Prior to shipping universal waste off-site, does the receiver agree to receive the shipment? [3745-273-18(D)] Yes No N/A RMK#
20. If the universal waste shipped off-site is rejected by another handler or destination facility does the originating handler do one of the following: *NO REJECTION*
- a. Receive the waste back? [3745-273-18(E)(1)] Yes No N/A RMK#
- b. Agree to where the shipment will be sent? [3745-273-18(E)(2)] Yes No N/A RMK#

21. If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss one of the following:
 Yes ___ No N/A RMK# ___
 a. Sending the waste back to the originating handler? [3745-273-18(F)(1)]
 Yes ___ No ___ N/A RMK# ___
 b. Sending the shipment to a destination facility? (If both the originating and receiving handler agree) [3745-273-18(F)(2)]
 Yes ___ No ___ N/A RMK# ___
22. If the handler received a shipment of hazardous waste that was not universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)]
 Yes ___ No N/A RMK# ___
23. If the handler received a shipment of nonhazardous, non-universal waste, was the waste managed in accordance with applicable law? [3745-273-18(H)]
 Yes ___ No N/A RMK# ___

EXPORTS

24. Is waste being sent to a foreign destination? If so:
 Yes ___ No N/A ___ RMK# ___
 a. Does the small quantity handler comply with primary exporter requirements in OAC 3745-52-53, 3745-52-56, and 3745-52-57? [3745-273-20(A)]
 Yes ___ No N/A RMK# ___
 b. Is waste exported only upon consent of the receiving country and in conformance with U.S. EPA's "Acknowledgment of Consent" as defined in 3745-52-50 to -52-57? [3745-273-20(B)]
 Yes ___ No N/A RMK# ___
 c. Is a copy of U.S. EPA's "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)]
 Yes ___ No N/A RMK# ___

REMARKS